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**IN THE UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF UTAH, CENTRAL DIVISION**

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Russell Greer,  
Plaintiff,

v.

Joshua Moon and Kiwi Farms,  
Defendants.

**PLAINTIFF'S SECOND  
SUPPLEMENTAL  
MEMORANDUM BRIEF IN  
SUPPORT OF PLAINTIFF'S  
MOTION FOR  
PRELIMINARY  
INJUNCTION AND  
PLAINTIFF'S COMPLAINT**

Case No. 2:20-cv-00647

Judge Tena Campbell

Magistrate Judge Jared C Bennett

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Pursuant to *FRCP 15(D)*, Plaintiff files this Second Supplemental Memorandum Brief, in response to recent events.

**INTRODUCTION**

On September 17<sup>th</sup>, 2021, Plaintiff received an alarming email from a “throw away” email using the Guerrilla Email domain. The email read:

“Well, Russell... looks like this is the end for you. Your new song failed thanks to troll comments. Your lawsuit failed thanks to payments made by Kiwi Farms to judges and lawyers to "look the other way" when you made filings and ignore all your arguments. And now our agents have smeared your name on Twitter, destroying any chance you had to be an activist.

No disabled people will ever be allowed to succeed. The fact is, you could have been the leader of a new generation of disabled activists... but thanks to us, that will never happen. But you should feel flattered. This has been a very expensive, very difficult operation. Believe me, influencing court outcomes against a skilled paralegal is not easy or cheap. You were a worthy adversary for us. But we finally won.

There is no hope for you... only despair... darkness... and doom.

Yours,

Kiwi Farms.” After the email was attached a photo of Adolf Hitler.  
**EXHIBIT A.**

This email seems to be authentic because Plaintiff was harassed earlier on Twitter this week and so he had to lock his account due to the trolls harassing him. The harassment was started by a user named @whorebitter who resides in the United Kingdom. It is believed she was a Kiwi Farms user because many users on Kiwi Farms are from England and there is no way she could have found Plaintiff without Moon’s website. **EXHIBIT B.** Not only that, but it’s the same pattern of behavior the Kiwi Farms users have been displaying towards Plaintiff: bring up incidents from years ago, Shame and name Plaintiff. Causing chaos.

With authenticity established, the email caused much distress to Plaintiff. It also tied Kiwi Farms directly to the harassment: creating a clear, connecting line of causation to Plaintiff’s stated claims. Plaintiff forwarded the email to the Las Vegas police. He is absolutely frightened.

There should be no doubt in this Court’s mind that Kiwi Farms is harming Plaintiff, whether Moon is directly involved, because as stated and as shown with established case law: Moon has authorized the conduct of these users to do this by providing the website, as shown in *Napster and Gersh*.

### **CONCLUSION**

Plaintiff hopes that this new evidence will help show the Court that Kiwi Farms is continuing to harm Plaintiff.

Dated: 09-17-2021

/s/ Russell Greer

Russell Greer

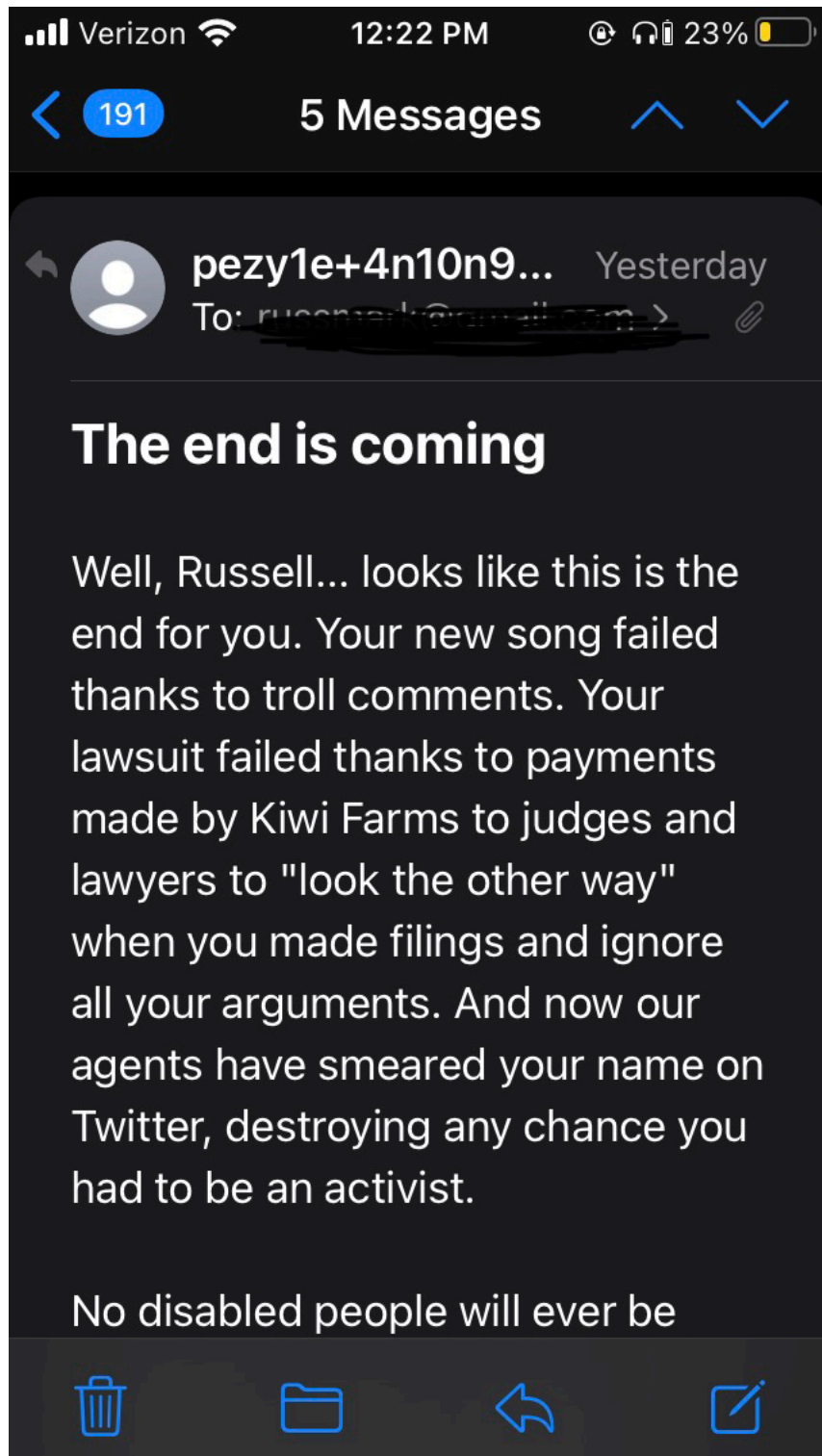
P . O. Box 46602  
Las Vegas, NV 89114  
801-895-3501  
Pro Se Litigant

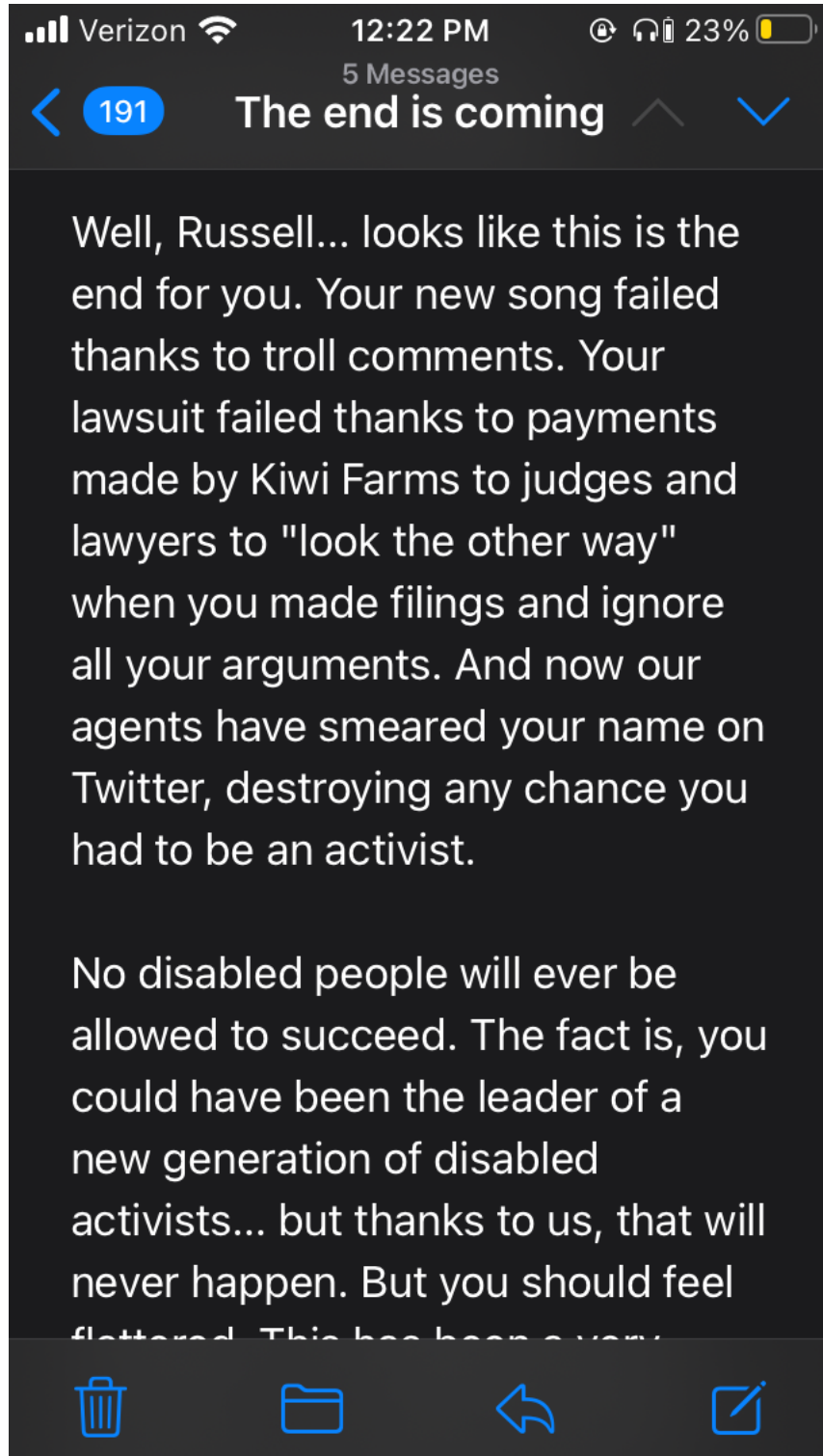
A handwritten signature in black ink, appearing to be 'R Greer', with a long horizontal stroke extending to the right.

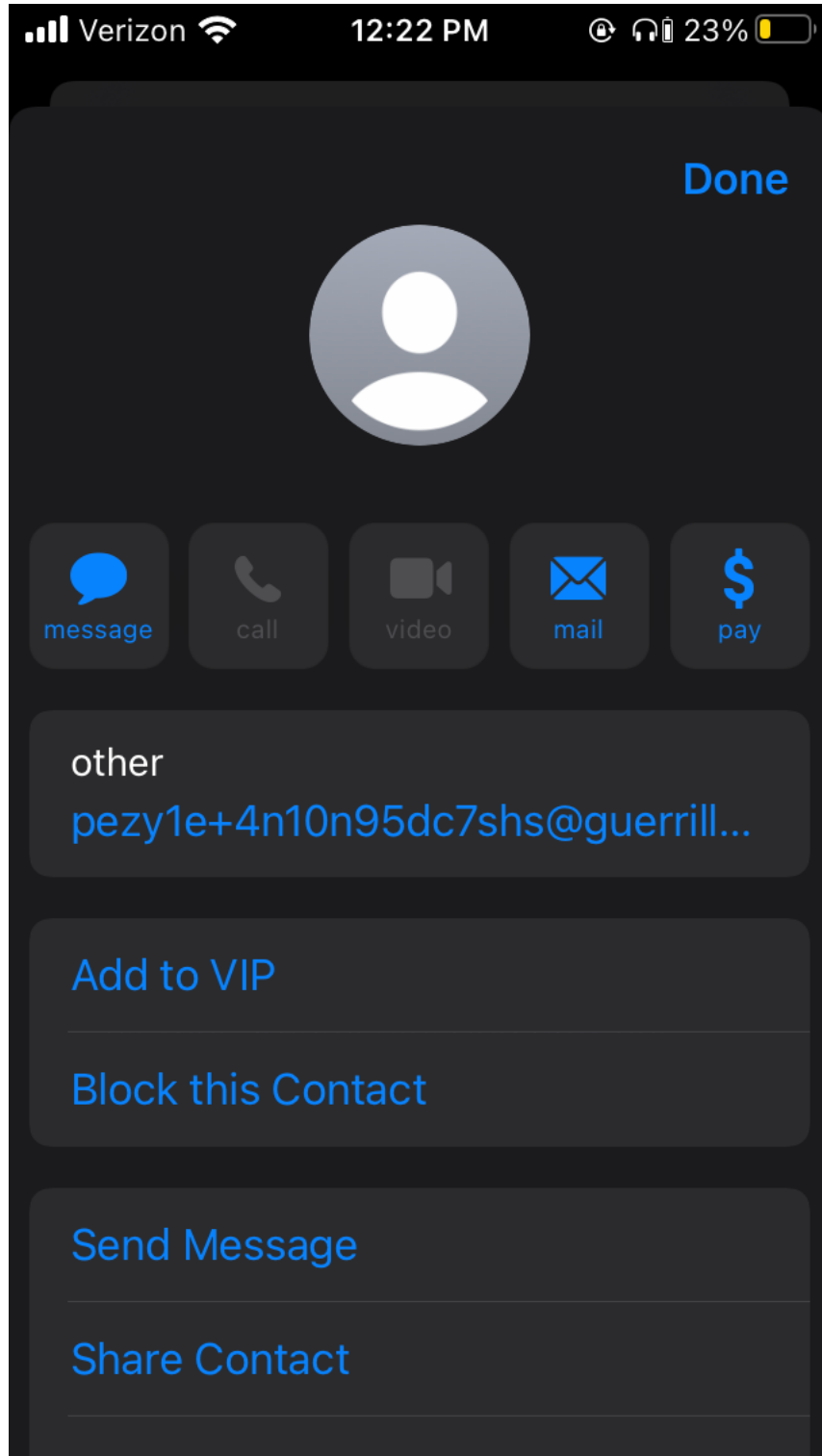
**CERTIFICATE OF SERVICE**

An electronic copy of the Motion for Leave to File Second Supplemental Memorandum Brief has been sent to the following attorneys, Greg Skordas, via the court electronic filing system.

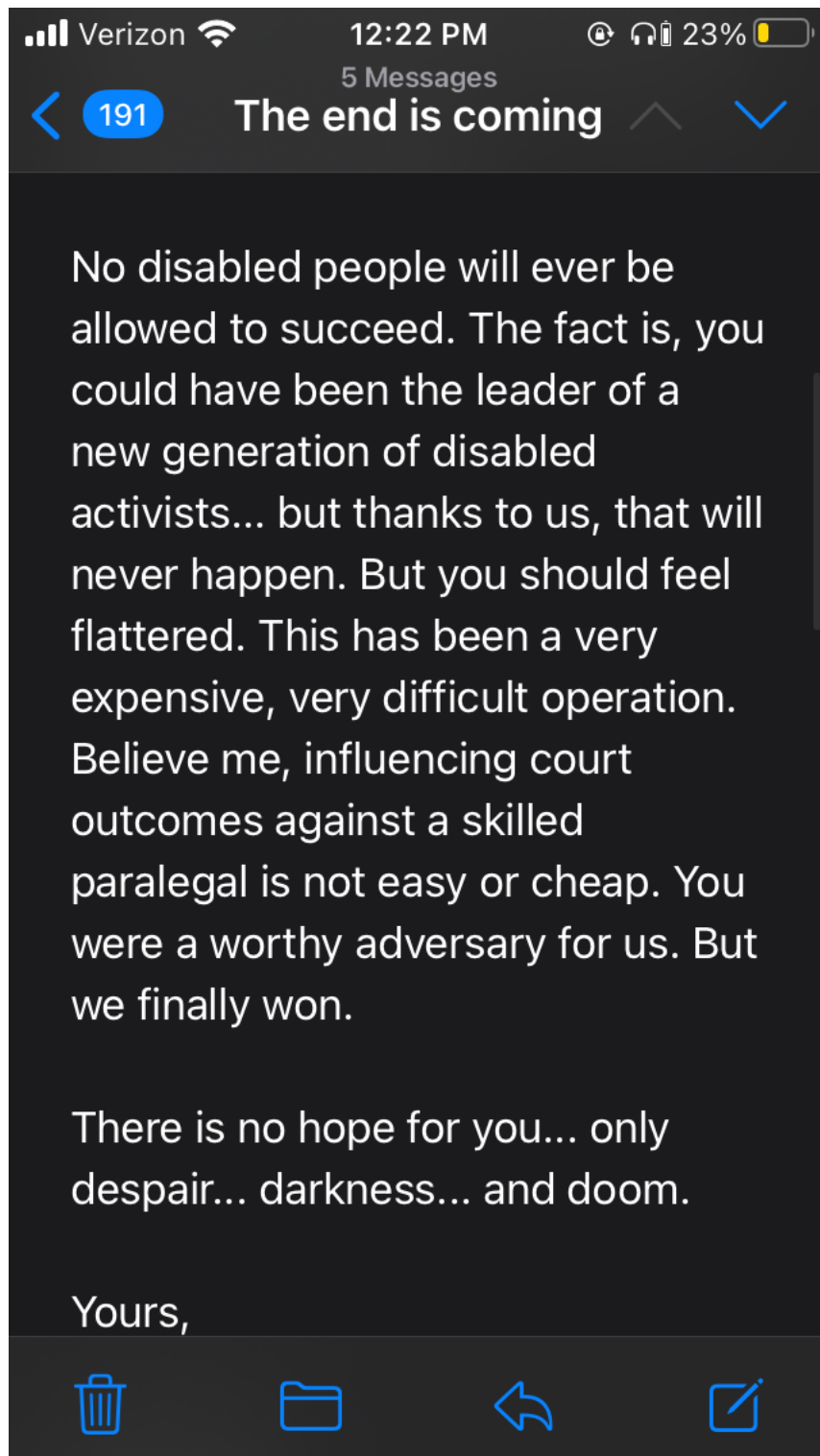
**EXHIBIT A**

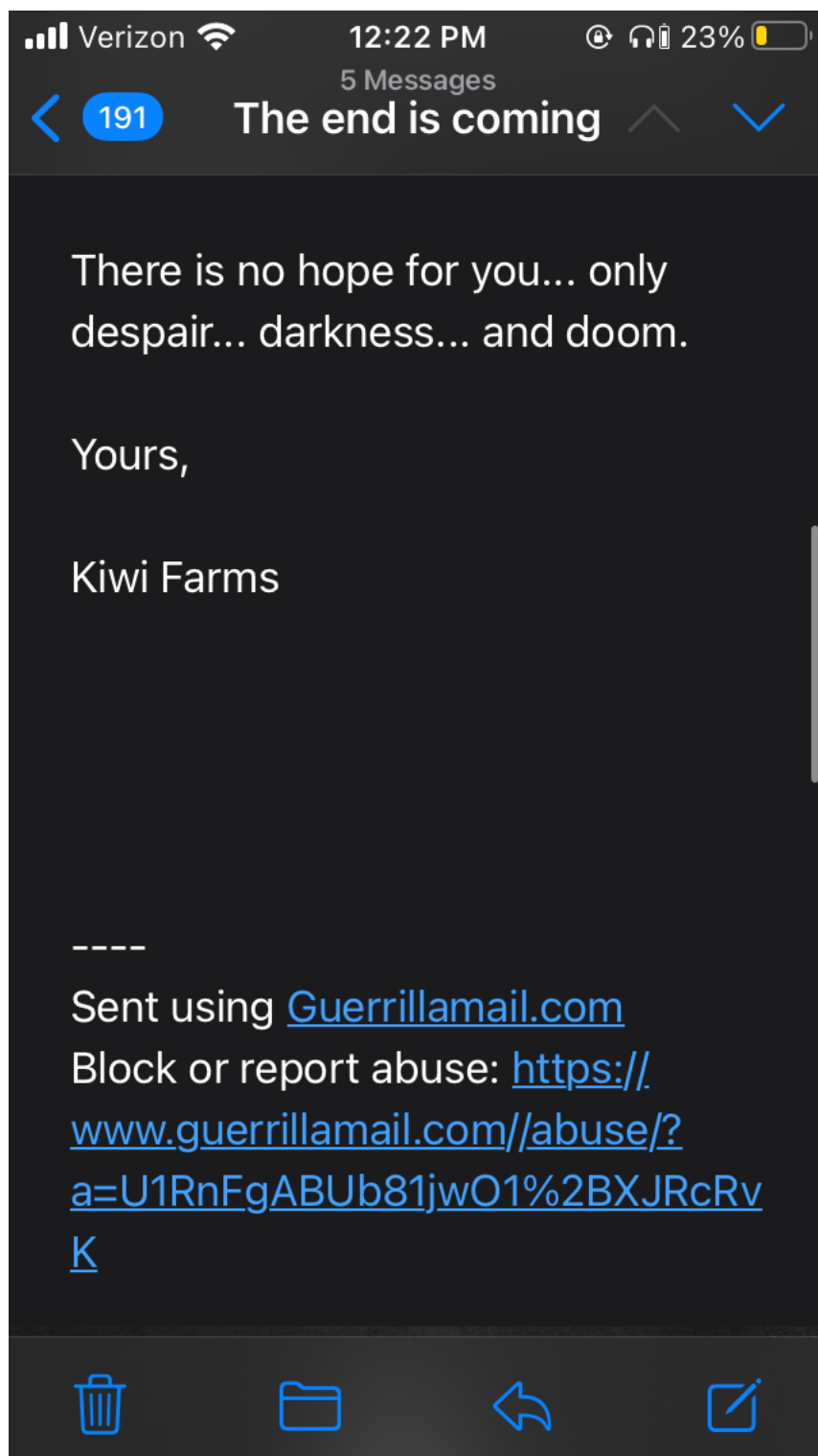














**EXHIBIT B**



